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14 Attorneys for Plaintiff
15 NATIONSTAR MORTGAGE LLC
16

17 NATIONSTAR MORTGAGE LLC
18 Plaintiff,
19 vs.
20 PATRICK JOSEPH SORIA, an
21 individual; *et al*,
22 Defendants.

23 CASE NO. 2:18-cv-03041 DSF (RAOx)

24 JUDGE: Hon. Dale S. Fischer
25 CTRM.: 7D

26 **STIPULATED PERMANENT
27 RESTRAINING ORDER**

28 ACTION FILED: April 11, 2018
TRIAL DATE: None Set

29 **FINDINGS**

30 By stipulation of the parties and being advised of the premises, the Court
31 finds:

32 **WHEREAS**, Plaintiff's counsel alleges and believes that over the past year
33 Defendant Patrick J. Soria and his mother have engaged in numerous actions which
34 constitute harassment as against Plaintiff Nationstar Mortgage LLC's counsel, Jered
35 T. Ede, amongst others, which such alleged actions include, but are not limited to:

36 - Hijacking counsel's mother's mortgage;

1 - Researching counsel's entire California homeownership history, concluding
2 with counsel's current personal residence, all without justification;
3 - Researched topics such as "how to f**k up an attorney" after this matter was
4 filed;
5 - Conducted google.com searches on counsel and his wife; and
6 - Asked paid individuals to conduct surveillance on counsel (as well as this
7 Court); among other things;

8 **WHEREAS** on Thursday, November 1, 2018, Defendant Soria requested
9 Nationstar's counsel's consent to an order to release Defendant Soria from custody,
10 which such consent was refused;

11 **WHEREAS** on Monday, November 5, 2018, counsel for Defendant Soria
12 (without knowledge of the alleged harassing activities discussed herein) disclosed
13 that Mr. Soria's mother, Soheila Soria, was putting pressure on Mr. Soria's counsel
14 to file a motion seeking an order releasing Defendant Soria from custody and that
15 there was a fear Ms. Soria might do "something stupid" to hurt herself;

16 **WHEREAS** Plaintiff's counsel, Jered T. Ede, Esq., represents that after dark
17 on Tuesday, November 6, 2018 at approximately 8:30 p.m., two threatening men
18 visited Mr. Ede's personal residence, one standing watch in his driveway while the
19 other shouted at Mr. Ede and his family through the window that Mr. Ede should
20 "cease and desist" or his "friend" would "take care of you tomorrow" and that Mr.
21 Ede "knows what this is about;"

22 **WHEREAS** on Wednesday, November 7, 2018, Mr. Ede was then presented
23 with a seven page letter from Mr. Soria's counsel (who has no knowledge of the
24 November 6, 2018 events above) containing a list of reasons why Mr. Soria believed
25 he should be released from custody;

26 **WHEREAS** on Thursday, November 8, 2018, Mr. Soria's counsel filed the
27 aforementioned motion seeking to release Mr. Soria from federal custody; and
28

WHEREAS the parties agree and understand that this stipulation is part of a compromise of disputed claims and that the provisions contained herein are not intended to be – and shall not be – construed as an admission of any liability, responsibility, or wrongdoing whatsoever, and that each undersigned party expressly denies any liability, responsibility, or wrongdoing;

THEREFORE, sufficient grounds having been shown, the parties and Soheila Soria **HEREBY STIPULATE AND AGREE** to the entry of the following order:

RESTRAINING ORDER

NOW, THEREFORE, it is hereby **ORDERED** that:

Protected Persons, as used herein, shall mean and include Howard D. Hall, Jered T. Ede, Jane M. Kutepova, Timothy A. Burnett, Carina Gallardo, Cheyenne Schneider and each of their spouses/domestic partners (registered or not), children, relatives, employees, co-workers, and agents, whether herein named or not¹, including but not limited to those individuals identified on Exhibit “A” – filed under seal in this matter. Exhibit “A” shall not be disclosed to the Restrained Persons at any time by anyone. Exhibit “A” may be amended from time to time upon application to this Court by any Protected Person(s).

Restrained Persons, as used herein, shall mean and include Patrick J. Soria². The information on the herein named Restrained Persons is as follows:

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¹ Many such individuals are, for their safety, not herein named.

² To be abundantly clear, the Restrained Persons cannot bypass this Restraining Order simply by engaging an otherwise unnamed individual to commit the harassment otherwise barred by this Restraining Order.

1 Patrick Soria: Male, Brown Eyes, Brown Hair, Height: appx 5'8",
2 Weight: appx 220lbs, DOB: 09/1985, Race: Persian, Last known
3 address: 4240 Lost Hills Road, Unit 2806, Agoura Hills, CA 91301;

4 1. The Restrained Persons shall not do the following things to any
5 Protected Persons:

6 a. Harass, stalk, surveil, intimidate, molest, attack, strike, threaten,
7 assault, hit, abuse, destroy personal property of, or disturb the
8 peace of the person;

9 b. Contact the person, either directly or indirectly, in any way,
10 including, but not limited to, in person, by telephone, in writing,
11 by public or private mail, by interoffice mail, by e-mail, by text
12 message, by fax, or by other electronic means;

13 c. Take any action to obtain the person's residential or work
14 address or location;

15 2. Restrained Persons must stay at least 500 yards away from the
16 Protected Persons, the residence(s) of Protected Persons, the
17 workplaces(s) of the Protected Persons, and the schools and/or child
18 care facilities of any children of the Protected Persons, including but
19 not limited to those locations identified on Exhibit "A" – filed under
20 seal in this matter (Exhibit "A" shall not be disclosed to the Restrained
21 Persons at any time by anyone; Exhibit "A" may be amended from time
22 to time upon application to this Court by any Protected Person(s)), the
23 vehicles or personal property of the Protected Persons, and the animals
24 or pets of the Protected Persons;

25 3. The Restrained Persons cannot own, possess, have, buy or try to buy,
26 receive or try to receive, or in any other way get guns, other firearms,
27 or ammunition.

1 4. If the Restrained Persons have not already done so, the Restrained
2 Persons must:

3 a. Within 24 hours of entry of this Restraining Order³, sell to or
4 store with a licensed gun dealer, or turn into a law enforcement
5 agency, any guns or other firearms or weapons of any kind, as
6 well as all ammunition, in their possession or control;

7 b. File a receipt with the Court within 48 hours of entry of this
8 Restraining Order⁴ that proves that such guns or firearms have
9 been turned in, sold, or stored (California Judicial Council Form
10 CH-800, “Proof of Firearms Turned In, Sold, or Stored” is
11 hereby approved for such receipt/purpose).

12 5. This Order must be entered into the California Restraining and
13 Protective Order System (CARPOS) through the California Law
14 Enforcement Telecommunications System (CLETS). By close of
15 business on the date after this Restraining Order is made, Counsel for
16 Plaintiff is ordered to deliver a copy of the Restraining Order to a law
17 enforcement agency of their choosing for this Restraining Order to be
18 entered into CARPOS.

19 6. Service of Order on Restrained Persons: Each of the Restrained Persons
20 are independently represented by counsel or have had access to
21 independent legal advice regarding the matters contained herein. No
22 service or additional proof of service of this Stipulation and/or Order is
23 required.

24 7. No Expiration: This Restraining Order is permanent and shall not
25 expire at any time except by order of *this* Court.

27 ³ and, in the case of Patrick J. Soria, the release of Mr. Soria from contempt incarceration

28 ⁴ and, in the case of Patrick J. Soria, the release of Mr. Soria from contempt incarceration

8. This Restraining Order does not prevent the Restrained Persons from going to or from their home or place of employment, provided however that the Restrained Persons may not move their place of residence or employment such as to knowingly or intentionally violate this Restraining Order;
9. Peaceful written contact through a lawyer or process server or other person for service of legal papers related to a court case is allowed and does not violate this Order, provided no such service is permitted at the residence of any Protected Persons;

IT IS SO ORDERED.

DATED: January 4, 2019

Honorable Dale S. Fischer
UNITED STATES DISTRICT JUDGE

STIPULATED AND AGREED:

DATED: November , 2018

By: PATRICK SORIA

8. This Restraining Order does not prevent the Restrained Persons from going to or from their home or place of employment, provided however that the Restrained Persons may not move their place of residence or employment such as to knowingly or intentionally violate this Restraining Order;
9. Peaceful written contact through a lawyer or process server or other person for service of legal papers related to a court case is allowed and does not violate this Order, provided no such service is permitted at the residence of any Protected Persons;

IT IS SO ORDERED, this day of November, 2018, at o'clock .m.

The Honorable Dale S. Fischer
United States District Judge

STIPULATED AND AGREED:

DATED: November 21, 2018

By:

PATRICK SORIA

1 DATED: November 26, 2018

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5 LEECH TISMAN FUSCALDO & LAMPL,
6 INC.
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8

9 By: /s/ Eric J. Wu

10 Phillip A. Toomey

11 Eric J. Wu

12 Attorneys for Defendant
13 PATRICK JOSEPH SORIA

14 DATED: November 26, 2018

15 HALL GRIFFIN LLP

16 By: /s/ Jered T. Ede

17 Jered T. Ede

18 Attorneys for Plaintiff

19 NATIONSTAR MORTGAGE LLC

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EXHIBIT “A”

FILED UNDER SEAL

HALL GRIFFIN

EXHIBIT “A”

FILED UNDER SEAL

EXHIBIT "A" - FILED UNDER SEAL
NOT TO BE DISCLOSED TO RESTRAINED PERSONS
Page 1 of 2

Howard D. Hall

Individuals:
Locations:

Jered T. Ede

Individuals:

Locations:

Timothy A. Burnett

Individuals:

Locations:

Jane M. Kutepova

Individuals:

Locations:

EXHIBIT "A" - FILED UNDER SEAL

NOT TO BE DISCLOSED TO RESTRAINED PERSONS

Page 2 of 2

Carina Gallardo

Individuals:

Locations:

Cheyenne Schneider

Individuals:

Locations: